

PERSONAL DATA

PENLAN FARMHOUSE PRIVACY POLICY

This Privacy Policy informs you of the origin and use of the information collected when you consult our website www.penlansugarloafmountain.com and its affiliated websites except for websites having specific privacy policies (hereinafter the "**Website**") and, more generally, within the framework of the relationship you may have with our company, including through social media websites (hereinafter the "**Processing**"). It is compliant with applicable English and United Kingdom regulations on personal data protection.

Penlan Farmhouse reserves the right to amend this Policy at any time and advises you to consult it on a regular basis.

For your part, we ask you to ensure that all the information you provide to Penlan Farmhouse and/or its affiliates or the Owners is true, accurate and up to date. If you are required to provide access to information concerning third parties (for example persons staying with you), you guarantee that you:

- have only provided access to strictly necessary information,
- have ensured that these persons are informed thereof and have not objected, or, when consent is required, that you have obtained such consent,
- will provide them with a copy of this Privacy Policy, in which the use of the term "**you**" applies both to you and the third parties in question.

1. DEFINITIONS

Capitalized terms and phrases, whether they are used in the singular or plural form, shall have the meaning indicated when they are first used either in this Policy or in our Booking Terms and Conditions accessible here

[BOOKING TERMS AND CONDITIONS](#)

or in The Data Protection Act 2018 which includes the UK General Data Protection Regulation (GDPR) on the protection of natural persons with regard to the processing of personal data and the requirement to make sure the information is used fairly, lawfully and transparently.

2. DATA CONTROLLER

We inform you that your Personal Data undergo Processing by Penlan Farmhouse.

The UK GDPR applies to data controllers. Processing is done by Penlan Farmhouse in which you may stay. Penlan Farmhouse has defined its respective obligations in this context by means of an agreement in accordance with UK GDPR. This agreement provides that Penlan Farmhouse plays a predominant role in defining the main purposes, Processing means, storage periods and applicable security measures. Regarding the exercise of your rights you may send your requests to Penlan Farmhouse agent or The Owner who will take care of any update of your Personal Data on the shared tools.

3. PERSONAL DATA COLLECTED

You may be asked to provide your Personal Data when you browse the Website, use the mobile application or are in contact with Us.

The mandatory or optional nature of the requested information is indicated when data are collected. Requested information is necessary to process your requests or Booking or to meet a regulatory obligation. Other information is generally designed to learn more about you or to improve the services offered to you. It is therefore optional.

In addition, some Personal Data may be collected indirectly, particularly from the Property.

Penlan Farmhouse particularly collects and Processes identification data (e.g. your last name and given name) and family and personal contact data (e.g. your address, phone number and email address), economic and financial data (such as your bank card number), data concerning your tastes, and your preferences and habits as regards your stays, marketing data, connection data (e.g. your IP address, your browsing data) and, more generally, data relating to the reason why you are in contact with us (e.g. data concerning your Bookings, Orders, requests for information, opinions, complaints).

Penlan Farmhouse does not intentionally collect sensitive data, such as information concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or details concerning your health or sexual life or preferences and asks you not to provide this kind of information.

4. PURPOSES OF COLLECTING YOUR PERSONAL DATA AND STORAGE PERIODS

Purpose	Legal Basis/Bases	Storage Period
<ul style="list-style-type: none"> To manage your Bookings made on a non-professional basis 	Performance of a contract to which the data subject is a party or performance of pre-contractual measures taken at their request	3 years after the date of your stay or Order, then archived for seven years before deletion
<ul style="list-style-type: none"> To manage your Orders for Gift Offers made on a non-professional basis 		
<ul style="list-style-type: none"> To manage your Account (Standard Account) opened on a non-professional basis 		3 years after the last connection to the Standard Account or after your last contact with Us
<ul style="list-style-type: none"> To improve and customize Penlan Farmhouse services 	Legitimate interests of Penlan Farmhouse (improve our services and prospect)	If you subscribe in the context of a Booking or Order: 3 years after your last contact with Us If you just subscribe to a newsletter: as long as you do not ask to unsubscribe
<ul style="list-style-type: none"> To manage your subscription to newsletters 		
<ul style="list-style-type: none"> To manage business development operations 		

<ul style="list-style-type: none"> ▪ To develop business statistics and statistical reports 	Legitimate interests of Penlan Farmhouse (improve our services)	10 years after the date of your stay or Order.
<ul style="list-style-type: none"> ▪ To manage, monitor and improve the guest relationship, assess quality and satisfaction (particularly pre- and post-Booking questionnaires) 	Performance of a contract to which the data subject is a party Legitimate interests of Penlan Farmhouse (improve our services)	2 years after your last contact with Us or one of our Properties. 2 years after that last contact, the entire questionnaire is anonymized.
<ul style="list-style-type: none"> ▪ To manage any litigation and unpaid amounts 	Performance of a contract to which the data subject is a party Legitimate interests of Penlan Farmhouse (defend rights in court)	For the duration of proceedings (until all remedies have expired) Invoices are stored for 10 years.
<ul style="list-style-type: none"> ▪ To manage your rights in respect of your Personal Data 	Meeting the legal obligations of Penlan Farmhouse	5 years after processing your request.



General

In any event, Personal Data are stored in an active database for a period not exceeding the period necessary to achieve the purposes for which they are collected.

After that period, certain Personal Data will then be archived with restricted access for a period not exceeding statutory limitation periods or applicable archiving obligations, and then destroyed.

5. SHARING YOUR PERSONAL DATA

Your Personal Data collected in the framework of the Processing may be sent:

- Internally, to the authorized persons at Penlan Farmhouse or its agent with which you make a Booking and/or that you may visit.

Your Personal Data may also be transferred to Third Parties which may use them for their own needs (and particularly to authorized agents for the purpose of handling a dispute such as attorneys, process servers, etc. and to certain social media such as Facebook when you use our Website or mobile application in connection with these social media). Similarly, if any company to which Penlan Farmhouse belongs or all or part of its assets are acquired by a third party, your Personal Data may be made accessible to anyone involved in the preparation and completion of the transaction and included in the assets sold.

6. YOUR RIGHTS

We remind you that you have a right of access to and rectification of incorrect data concerning you and, in the cases provided for by regulations, a right to object and a right of erasure of some of your Personal Data, a right to restrict their use or to request their portability for transfer to a third party, and a right to withdraw your consent, if We base processing on your consent.

To exercise any of these rights, please write to:

hello@penlansugarloafmountain.com

If We are unable to identify you with certainty, for security reasons, you must send a photocopy of an ID document with your request. You will be sent a reply within one month of your request being received, subject to any longer period in accordance with the provisions of the GDPR.

Furthermore, you are reminded that Penlan Farmhouse may, in accordance with regulations, refuse to grant certain requests concerning some of these rights (particularly the right of erasure), for legitimate reasons such as the need to defend rights in court or a legal obligation to retain certain data.

You may also lodge a complaint with the Information Commissioner's Office (ICO), UK data protection authority.